

**REMARKS**

In response to the Office Action dated April 24, 2002, Applicants respectfully request reconsideration and withdrawal of the objections to the disclosure and rejection of the claims.

The drawings were objected to on the grounds that they did not include certain reference labels. In response thereto, Figure 1 is being revised in the accompanying Request for Approval of Drawing Changes, to insert the reference label "PP6," cited in the specification.

The Office Action states that the reference label "COS" is not identified in Figure 1. However, it is to be noted that this reference label appears in Figure 2, which is identified at the end of the sentence in which this reference label appears (the sentence bridging pages 8 and 9 of the specification). In any event, to avoid possible confusion, this sentence has been amended so that the reference to Figure 2 appears immediately adjacent the label "COS."

The Office Action also sets forth an objection on the grounds that the reference labels PP3, CP2-CP5, LS2-LS5, DEP2-DEP5 and LD2-LD5 are not shown in Figure 1. It is to be noted that none of these reference labels are explicitly recited in the specification. Rather, the figures depict ranges of elements in which only the first and last elements in a range are illustrated. For example, the first customizing station PP1 and the last customizing station PP6 are illustrated in Figure 1. The existence of additional customizing stations between these two illustrated stations is depicted by the dashed vertical line between them. A similar technique is employed for the smart cards CP, the reader/encoders LE, the microprocessor TBP, and the various serial links LS and LLE. It is respectfully submitted that a person of ordinary skill in the art would readily understand the subject matter depicted in the figures, and its corresponding description in the specification. Withdrawal of this ground of objection is therefore respectfully requested.

Section 3 of the Office Action contains an objection on the grounds that the reference labels LLE and DA are not mentioned in the description. However, it is

respectfully submitted that the reference label LLE is mentioned at page 8, line 26, and the reference label DA is mentioned at page 9, line 1.

In response to the objection appearing in section 4 of the Office Action, the appropriate correction has been made at page 9, line 11.

Claims 1, 2, 4, 5, 7 and 8 were rejected under 35 U.S.C. § 103 as being unpatentable over the Tushie et al. patent in view of the Sehr patent. Claims 3 and 6 were rejected under 35 U.S.C. § 103 as being unpatentable over these two references in view of additional cited patents. It is respectfully submitted that the Tushie patent does not suggest the claimed subject matter to one of ordinary skill in the art, even when it is considered in light of the other cited references.

As discussed in the background portion of the application, the present invention is concerned with management of the data exchanges that occur between customizing appliances and devices which deliver the customizing data. See the application, for example, at page 2, line 20 to page 3, line 2. In accordance with the claimed invention, efficient data exchange is accomplished by means of an interface which manages the data exchanges. In the embodiment of Figure 1, this interface comprises a computer PC having a multiport card CM. This card is connected to each of the customizing stations by means of respective serial links LS, and to each of the peripheral encryption devices DEP by means of respective serial links LD. A multitasking system on the computer PC is responsive to requests for customizing data from the stations, and addresses them to available ones of the encryption devices. Responses from the encryption devices are transmitted to the appropriate requesting stations, via the multiport card.

As a further feature of the invention, the delivery of the encrypted data from the devices DEP is separate from other data delivered via a control device DC. As illustrated in Figure 1, the control device is connected to the various customizing machines MP by means of a bus BC, whereas the encryption devices are connected to the customizing stations by means of the previously mentioned serial links LS.

The rejection of claim 1 implies that the Tushie patent discloses all of the features recited in the claim, with the exception of a bi-directional link between a management

interface and a customizing machine. To this end, the rejection relies upon the Sehr patent as teaching bi-directional communication, and alleges that it would be obvious to employ such in the context of the Tushie system.

It is respectfully submitted that the differences between the claimed invention and the Tushie patent do not lie solely in the presence or absence of a bi-directional link. Rather, the Tushie patent fails to disclose a management interface of the type recited in the claim. As set forth therein, the management interface is connected to both a customizing machine and a data server by means of a bi-directional link, and operates to receive requests for customizing data from customizing machines and transmit them to an available server upon receipt, as well as to receive the corresponding responses and transmit them to the requesting customizing machines. The architecture of the present invention, as recited in claim 1, results in the advantages described in the specification at page 4, line 23 to page 6, line 10. The Tushie patent does not provide any details on the manner in which data exchanges are managed, and therefore fails to suggest a system which provides these same advantages.

Furthermore, the Tushie patent fails to disclose other features of the invention recited in the dependent claims, whether considered by itself or in connection with the other references. For example, although claim 2 has been rejected, the Office Action does not identify teachings in any of the references which disclose or otherwise suggest the execution of the tasks recited in this claim.

In connection with claim 3, the Office Action refers to the Congdon patent as teaching the use of a multi-port card. However, the rejection fails to provide any motivation for using such a card as an interface between a data server and customizing machines in a system for customizing smart cards, and particularly for using such a card in the context of the Tushie system.

Claim 4 recites that each customizing station comprises a microprocessor and a reader, and further includes two serial links, one of which connects the microprocessor to a computer of the server, and the other of which connects the microprocessor to the reader. The rejection of this claim refers to portions of the Tushie patent that discuss the *format* of

data passed between software modules. It is not seen how this discussion of data formats discloses, or otherwise suggests, the specific type of hardware connections recited in claim 4, using two serial links.

Claim 6 is directed to the particulars of the adaptation device for converting a multi-conductor output connector of a microprocessor into the two serial links recited in claim 4. An example of such an adaptation device is depicted in Figure 2 of the application. The rejection of this claim refers to the Briel et al. patent, with extensive discussion of a multi-port switching system for a computer bus. It is not apparent from the Office Action how this discussion is being related to the language of claim 6. If the rejection of claim 6 is maintained, the Examiner is respectfully requested to identify those elements in the Briel patent which are being interpreted to correspond to the components recited in claim 6, namely a switching circuit having two switches whose input terminal is connected to a clock output terminal and to an output terminal for data signals, which is controlled by a signal on another output terminal, and two adapter circuits whose input terminals are each connected to an output terminal of a switch and also connected to output terminals for electrical power supply and ground reference. In the absence of such a showing, it is respectfully submitted that the rejection should be withdrawn.


For reasons similar to those presented above, it is respectfully submitted that new claims 9-17 are likewise patentable over the references of record. Specifically, claims 9-12 depend from claim 1, and are therefore allowable for at least the reasons presented in connection with claim 1. Furthermore, they recite that the customizing system includes plural customizing stations, customizing machines and/or data delivery devices that are connected to the management interface via respective links. It is respectfully submitted that these features are also not suggested by the Tushie patent. Claim 13 recites a card customizing system that includes, among other elements, a management interface that is connected to each of a plurality of customizing stations and a plurality of data delivery devices, and that is responsive to requests received from the customizing stations to deliver them to an available one of the devices, and transmit responses from the devices to the requesting customizing stations. As discussed previously, the Tushie patent does not

disclose a management interface of this type, whether considered alone or in combination with any of the other references. Claims 14-17 depend from claim 13, and are therefore patentable over the references for at least this same reason.

In view of the foregoing discussion, it is respectfully submitted that all pending claims are patentable over the prior art of record. Reconsideration and withdrawal of the rejections and objections, and allowance of all pending claims, are respectfully requested.

Respectfully submitted,

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**Attachment to Amendment dated July 24, 2002**

**Marked-up Copy**

Page 8, Paragraph Beginning at Line 24

In this example embodiment, each microprocessor TBP is equipped with two serial links LS, one LS to the computer PC and the other LLE to the reader/encoder LE. However, where the microprocessor TBP is equipped not with two serial links but with an eight-conductor connector COS, as shown in Figure 2 for example, some of these conductors may be used for effecting serial links using an adaptation device DA which comprises two adaptors for serial connection SLA1, SLA2 and a switching circuit RS according to the diagram in Figure 2.

Page 9, Paragraph Beginning at Line 4

Figure 2 depicts the eight terminals of an output connector COS comprising:

- a terminal RST for resetting,
- a terminal  $V_{pp}$  for the programming voltage,
- a terminal  $V_{cc}$  for the supply voltage,
- a terminal CLK for the clock signal,
- a terminal I/O for the data signals,
- a terminal [GNP] GND for the earth potential,
- a terminal FUSE 1 for a first programming fuse,
- a terminal FUSE 2 for a second programming fuse.